OREGON EVICTION, DIVERSION AND PREVENTION PROGRAM (OREDAP) PROGRAM MANUAL

1. Contents

2. Program Overview ........................................................................................................................................ 3
   Oregon Eviction, Diversion, and Prevention Program (OREDAP) ................................................................. 3
   Oregon Eviction, Diversion, and Prevention Program (OREDAP) ................................................................. 3

3. Eligible Expenses ......................................................................................................................................... 5
   Ineligible Expenses ........................................................................................................................................ 11

4. Program Eligibility ..................................................................................................................................... 11
   Residency ..................................................................................................................................................... 11
   Income Guidelines ........................................................................................................................................ 11
   Determining Household Size ......................................................................................................................... 13
   Housing Status ............................................................................................................................................ 13

5. Documentation .......................................................................................................................................... 13
   Document Checklist .................................................................................................................................... 14
   Documentation of Income .............................................................................................................................. 15
   Proof of Identity .......................................................................................................................................... 15
   Documentation of Residency and Rental Obligation, if providing rental assistance, utility assistance, or subsidy .................................................................................................................................... 16

6. Household Application Process ................................................................................................................ 17
   Household Application Process .................................................................................................................... 17
   Prioritization ............................................................................................................................................... 18
   Outreach ...................................................................................................................................................... 18
   Notification of Final Determination ............................................................................................................ 19

7. Additional Guidelines ............................................................................................................................... 21
   OREDAP Assistance is Not Considered Income .......................................................................................... 21
2. Program Overview

Oregon Eviction, Diversion, and Prevention Program (OREDAP)

On January 10th, 2023, the Governor of Oregon, Tina Kotek, issued an Executive Order declaring a State of Emergency on Unsheltered Homelessness. Via Oregon Housing and Community Services (OHCS), the state’s Continuum of Care (CoC) Agencies were allocated funding for Shelter and Re-housing services, and the Community Action Agencies (CAA) were allocated funding for Eviction Prevention. Lane County is both the local CoC and CAA. Funds from this Emergency Order are meant to assist low-income residents in Lane County at risk of eviction or facing unsheltered homelessness, by providing Diversion, Prevention, and Subsidy assistance, and to maintain and sustain the programming made possible by the first phase of funding.

The purpose of the Eviction Diversion and Prevention Program is to quickly identify and prevent evictions and divert households from unsheltered homelessness, while supporting households who may experience evictions with humane, dignified interventions. OHCS also seeks to divert households from unsheltered homelessness and further housing instability and to reduce the racial disparities evident in eviction cases. As of December 2023, Lane County was awarded $2,903,859 in Diversion, Prevention, and Subsidy funding. These funds were provided directly to Lane County from Oregon Housing Community Services.

Oregon Eviction, Diversion, and Prevention Program (OREDAP)

These funds are for households with at least one individual who:

(1) has one of the following housing statuses:

a. at imminent risk of homelessness,
   b. received an eviction notice or notice to vacate, is couch-surfing, doubled-up, or otherwise staying with friends or family and can no longer stay,

(2) has a household income below 80% area median income (AMI); and/or

(3) is obligated to pay rent at their residence within Lane County, Oregon (if paying move-in and/or rent assistance).

The program provides Program Staffing costs, Admin, and Client Financial Assistance. In addition to client financial assistance, agencies will also provide case management support to households. This case management will include assistance with program participant identified short- and long-term goals in order to increase long-term housing stability.
<table>
<thead>
<tr>
<th>OREDAP Requirements</th>
<th>OREDAP Housing Status Eligibility</th>
<th>OREDAP Income Eligibility</th>
<th>OREDAP Prioritization</th>
<th>OREDAP Eligible Program Components</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Rental must be located in Lane County, Oregon.</td>
<td>• Imminent risk of homelessness • Received an eviction notice or notice to vacate • Couch-surfing, doubled-up or otherwise staying with friends or family and can no longer stay</td>
<td>• At or below 80% AMI</td>
<td>First Priority: Households facing eviction Second Priority: Households at imminent risk of homelessness Third Priority: Households who have received a notice to vacate or are doubled up or “couch-surfing”</td>
<td>• Program Delivery Expenses • Client Financial Assistance • Admin</td>
</tr>
</tbody>
</table>

### 3. Eligible Expenses

All financial assistance must be associated with the household’s primary residence and used for the purpose of preventing unsheltered homelessness. There is no specific dollar amount limit to the financial assistance per household, but agencies may choose to create a cap for financial assistance. If an agency does this, they must state the cap in their program policies and procedures. Providers must work to ensure they meet the contractually identified target outcome focused on the number of households stabilized with the OREDAP funding provided.

All payments must be supported by document back-up such as a lease, bill, invoice, or evidence of payment to the provider of the service, and kept in the client file.

ORE-DAP assistance may be provided only to eligible renting households, which is defined to include only households that are obligated to pay rent on a residential unit in Lane County.

The tenant needs to have a current lease/rental agreement in place with the property owner or property management company.
<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Translation Services</td>
<td>Development of a language access plan and translation of web and print materials into languages most utilized in the service community. Expenses tied to enabling access to services for users with limited English proficiency.</td>
</tr>
<tr>
<td>Program implementation planning</td>
<td>Planning activities related to preparing to implement the program. Planning meetings, onboarding, and training expenses.</td>
</tr>
<tr>
<td>Equity and accessibility efforts</td>
<td>Expenses tied to accommodations and efforts to ensure the program is delivered equitably with the most vulnerable and underserved Oregonians in mind. Expenses tied to building equitable service delivery into the program design and ensuring the program is accessible to those who are differently abled or lack the resources to engage in the traditional platforms/points of program entry.</td>
</tr>
<tr>
<td>Program evaluation</td>
<td>Regular evaluation of program efficacy, outcomes, generating reports, charts, and visualizations. May include materials and expenses tied to these efforts.</td>
</tr>
<tr>
<td>Training &amp; Technical Assistance</td>
<td>Staff training related to the development and implementation of the grant program. This includes training materials, training space rent and expenses, equipment, and transportation.</td>
</tr>
<tr>
<td>HMIS and data system expenses</td>
<td>Set up and maintenance of HMIS access and utilization. This includes hardware, set-up fees, maintenance, software, subscription fees, and training needs.</td>
</tr>
<tr>
<td>Personnel – Staff time</td>
<td>Staff wages, salaries, and employment benefits for staff who deliver services and those who directly oversee program operations.</td>
</tr>
<tr>
<td>Direct to Program Non-Personnel Expenses</td>
<td>Direct expenses tied to the operation of the program as space rent, office supplies, equipment, and vehicle leasing tied directly to staff operating the program.</td>
</tr>
<tr>
<td>Case Management Services</td>
<td>Direct services and referrals tied to activities associated with individualizing and integrating employment, health care, connections to benefits, and other housing-related options for</td>
</tr>
</tbody>
</table>
or with an individual or household. Case managers assist clients in assessing and coordinating any services necessary to address their housing instability. It is a collaborative process that involves planning, implementing, monitoring, and evaluating the options and services for each client. Please see “Case Management Services” below chart for more information.

| Housing and Health Navigation Services | Housing navigation and housing education are services that help individuals and families experiencing housing instability or homelessness to identify opportunities and address barriers to housing. A specialist who assists people in locating and securing affordable housing is called a housing navigator. Healthcare navigators can help patients navigate the clinical care system. Responsibilities include helping patients to find and access treatment. Housing stability is a social determinant of health and health stability supports housing stability. Thus, we view them as interdependent. |
| In-person services | Telephone and web data systems, call routing, tracking, and data collection. On site service delivery and setting up trauma-informed spaces for clients to converse privately related to their cases and housing or case concerns. |
| Participant Support Meetings and Events | Meetings and events involving program participants as a part of the grant program to engage in supportive activities such as cohorts, services geared toward gaining employment, raising income, budgeting, educational opportunities, case management activities, etc. |
| Transportation/Travel | Transportation, meal expenses, and lodging tied to approved grant activities such as out-of-area educational conferences. Travel is allowable as a direct program cost when such travel will provide direct benefit to the participant or grant program. |

<p>| PROGRAM EXPENSES |
| Rent and utilities payments and arrears | Past due rent and utilities payments, without a maximum number of allowable months. |</p>
<table>
<thead>
<tr>
<th>Service Type</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Future rent and utility assistance</strong></td>
<td>Future month by month rent and utility payments, without a maximum number of allowable months. Household must be in the program to receive financial assistance each month. Agency must have policy related to serving program participants and community equitably.</td>
</tr>
<tr>
<td><strong>Security deposits</strong></td>
<td>Security deposit payment in current unit or unit household is moving into to attain housing stability.</td>
</tr>
<tr>
<td><strong>Moving expenses</strong></td>
<td>Moving expenses related to a new housing unit or out of a housing unit that does not offer stability. Expenses can include moving truck, packing supplies, movers, and helpers for differently abled households. No moving into or out of Lane County will be supported by program expenditures. Services are for residents of Lane County and those seeking long-term housing stability in Lane County.</td>
</tr>
<tr>
<td><strong>Application fees</strong></td>
<td>Rental application fees for new housing unit.</td>
</tr>
<tr>
<td><strong>Civil legal services (legal advice, legal representation, court fees)</strong></td>
<td>Civil legal services are legal assistance to low-income households who have non-criminal legal concerns. Legal services may include: Mediation to help disputing parties to reach a mutually agreeable settlement. Arbitration to make a binding decision to settle a dispute. Preparation of legal documents. Representation of clients in negotiations, court, or arbitration.</td>
</tr>
<tr>
<td><strong>Landlord/Tenant Mediation Services</strong></td>
<td>Mediation is &quot;a process in which a mediator assists and facilitates two or more parties to a controversy in reaching a mutually acceptable resolution of the controversy. Includes all contacts between a mediator and any party or agent of a party, until such time as a resolution is agreed to by the parties or the mediation process is terminated.&quot; ORS 36.110[5]). In landlord-tenant mediation, a neutral third party, the mediator, helps landlords and tenants resolve conflicts and disputes related</td>
</tr>
</tbody>
</table>
to their rental relationship. Mediation may or may not be mandatory depending on if it falls under Chapter 90 Statute. The mediator works to facilitate a mutually beneficial, and a legally-binding (if signed by both parties) resolution to their dispute. Mediation is an informal and voluntary way of resolving disputes between tenants and landlords.

<table>
<thead>
<tr>
<th>Pet rent and pet deposit</th>
<th>Pet rent payments and payments of security deposits for pets in housing units. Per statute, landlords are not able to charge pet rent or deposit for service animals.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing-related fees</td>
<td>Rent/utility late fees, housing-related court fees, and utility reconnection fees.</td>
</tr>
<tr>
<td>Work supports</td>
<td>Expenses including training costs, transportation assistance, childcare and eldercare needs, and clothing to support employment needs.</td>
</tr>
<tr>
<td>Furniture and household goods</td>
<td>Up to a maximum of $2000 per household for basic furniture and household goods to make the unit habitable for the household needs. These expenses can include bed, bed frame, seating,</td>
</tr>
<tr>
<td>Transportation</td>
<td>Costs, such as bus/train passes, direct gas costs, Uber/Lift/Cab fares, car repairs/insurance are allowable and travel related expenses to support participant appointments for employment, benefits, medical needs, or any other related activity tied to their housing stability plan.</td>
</tr>
<tr>
<td>Indirect to Program Non-Personnel Expenses</td>
<td>Operation of the program and overhead expenses, such as rent, utilities, office supplies, equipment, and vehicle leasing.</td>
</tr>
</tbody>
</table>

**ADMINISTRATIVE COSTS**

| Admin expenses | Costs and expenses associated with the administration of the grant. This can include direct and indirect costing of Operations, IT, Executive Team, Human Resources, and Finance expenses tied to administering the program. |
Ineligible Expenses

The program cannot pay for the following expenses:

- Business expenses,
- Homeowner expenses,
- Off-site storage,
- Off-site parking,
- Cable TV or online streaming services,
- Propane,
- Bulk fuel costs,
- Gift Cards
- Gas Vouchers
- Direct payments to participants

4. Program Eligibility

Residency

Household and Rental unit must be located within Lane County, Oregon.

Income Guidelines

Household must be at or below 80% of Area Median Income (AMI). Updated AMI can be found on the Lane County website: https://www.lanecounty.org/government/county_departments/health_and_human_services/human_services_division/provider_tools/income_guidelines_a_m_i_f_p_l

<table>
<thead>
<tr>
<th>HH SIZE</th>
<th>80% AMI Gross Monthly Income</th>
<th>80% AMI Gross Annual Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$ 4,163</td>
<td>$ 49,950</td>
</tr>
<tr>
<td>2</td>
<td>$ 4,754</td>
<td>$ 57,050</td>
</tr>
<tr>
<td>3</td>
<td>$ 5,350</td>
<td>$ 64,200</td>
</tr>
<tr>
<td>4</td>
<td>$ 5,942</td>
<td>$ 71,300</td>
</tr>
<tr>
<td>5</td>
<td>$ 6,421</td>
<td>$ 77,050</td>
</tr>
<tr>
<td>6</td>
<td>$ 6,896</td>
<td>$ 82,750</td>
</tr>
<tr>
<td>7</td>
<td>$ 7,371</td>
<td>$ 88,450</td>
</tr>
<tr>
<td>8</td>
<td>$ 7,846</td>
<td>$ 94,150</td>
</tr>
</tbody>
</table>
Income from the following sources is specifically excluded for the purpose of income eligibility requirements for this program:

- Supplemental employment income issued during the COVID-19 pandemic;
- Tax credits, including those paid in advance by the U.S. Treasury such as child tax credits, Stimulus Checks, and Earned income Tax Credit;
- Past rental assistance (i.e. ERRLC, LC, OERAP funds);
- Loans;
- Student loans; and
- Student aid grants.

While household assets should be identified to determine that a program applicant lacks the resources to obtain or retain permanent housing, they are generally not counted as income. Receipt of past rental assistance does not count as income.

Income includes the current gross income of all adult household members at the time of application. Income earned by household members who are minors and are not considered heads of household is excluded. Household assets are generally not counted as income. If a household receives SSI/SSDI income for a minor child who is not considered the head of household, that amount is excluded from the total household income.

With respect to each household applying for assistance, each agency or program team may choose between using the definition of “annual income” as provided by HUD in 24 CFR 5.609 and using adjusted gross income as defined for purposes of reporting under Internal Revenue Service (IRS) Form 1040 series for individual Federal annual income tax purposes.

Documentation methods of income include:

- Previous 12 months of income;
- “Snapshot” of current income (at time of assessment);
- Previous 30 days of income.

Convert periodic wages to annual income by multiplying:

1. Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40- hour week and no overtime);
2. Weekly wages by 52;
3. Bi-weekly wages (paid every other week) by 26;
4. Semi-monthly wages (paid twice each month) by 24; and
5. Monthly wages by 12.

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work. **Whichever time period you choose to convert wages to, monthly or yearly, the same time period must be used for all adult**
members of the household. Agencies must integrate their income calculation process and forms into the program's policies and procedures.

Determining Household Size

The household size is the number of people living at the rental as their permanent residence. If a tenant lives part-time in the household, the address where they live more than half the days of the month is considered their permanent residence. All people living at the rental must be included on the rental assistance application as household members, even if they do not share finances with the other tenants living at the rental. All adults and children living at the rental are included, even if they are not listed on the lease. In a roommate/boarder situation where household members share the rental but have separate leases with the landlord, such as student housing, a tenant may apply independently from other roommates/boarders.

Housing Status

OREDAP funds are prioritized as follows for households with at least one individual has:

(1) Received an eviction notice; or
(2) Met the definition of At Imminent Risk of Homelessness; or
(3) Received a notice to vacate; or
(4) Met the definition of couch-surfing, doubled-up or otherwise staying with friends or family and cannot stay there

Imminent Risk of Homelessness: Household or individual who will imminently lose their primary nighttime residence provided that:

- The primary nighttime residence will be lost within 21 days of the date of application for assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.

5. Documentation

Electronic or paper files must be kept for all applicants. Documentation of all applicant eligibility information must be available in applicant files or if kept electronically, available upon request in the format requested. Documentation must be retained per records retention policies for at least 6 years. Agencies must create policies and procedures
regarding documentation collected to assess participant eligibility and justify program costs.

The applicant must be able to document the required eligibility criteria for this program. Applicants and program staff must document their attempts to obtain primary documentation and staff are to try to collect primary sources of documentation for each criteria. In the absence of primary source documentation, self-attestation (self-certification) may be acceptable. Attempts by the applicant can provide evidence efforts to obtain documentation.

A third-party may be designated by an applicant to sign documents on their behalf when they are unable to do so. When a form is being signed by an authorized third-party, it should be clear that authorization was given, for example, a document may be have a note under the signature stating that “Signed by [authorized third-party name] on behalf of [applicant name], per verbal authorization.”

Document Checklist

Documents provided by applicant:
- Proof of income for all adults in the household
- Proof of identity for the head of household
- Proof of residency and rental obligation for the head of household

Documents provided by vendor:
- W-9
- Ledger of rental payment and late payments
- Formal notice/letter of non-payment of rent or other services

Required Forms:
- OREDAP Application, completed by applicant:
  - Verification of housing status
  - Required data elements
  - Verification of income
  - Household information/Case notes documenting situation
- Housing Stability Plan if provided more than one time assistance
- Documented request/need for funds
- Itemization of financial assistance or purchases of items provided to the household with fund source specified
- Release of Information including funders and OHCS
- Proof of agency grievance form provided to participant
- If terminated for cause, verification that the participant was notified in writing and given the opportunity to appeal
Documentation of Income

Documentation to verify income includes but is not limited to primary sources of documentation (preferred) such as:

- Paystubs, W-2s or other wage statements, tax filings
- Bank statements demonstrating regular income
- An attestation from an employer
- Profit and loss statement if self-employed
- Benefit award letters or proof of benefits for unearned income for any household member (examples: current year social security letter, pension letter, unemployment, cash assistance, proof of TANF benefits from DHS, etc.)
- Documentation of child support, annuities or any income sources.

When applicants are not able to immediately provide full documentation of their income, program staff may utilize self-certification to document income. This may serve as a supplement to other incomplete income documentation, or serve as the sole documentation of income for the household.

Income eligibility may be determined via primary sources of documentation, or self-declaration of income.

Proof of Identity

Proof of identity is required only for the primary applicant – government issued photo identification is preferred. A social security number or other documentation of citizenship is not required.

First Preference (Government Issued Photo ID)

- Driver’s license or ID card issued by a U.S. federal, state, or local government agency
- Driver’s license or ID card issued by a foreign government entity
- U.S. or Foreign Passport, or Passport Card
- Native Tribal card or ID
- Government Employee Photo ID card or badge
- U.S. Military ID
- U.S. Permanent Resident Card

Second Preference (Non-Photo ID or Non-government issued Photo ID)*

- Social Security Card
- Voter Registration Card
- Birth Certificate
- Non-government employee Photo ID card or badge
• School or University ID with a photo
• Benefits letter(s) for SSI, SSDI, etc.
• Medicaid or other Healthcare card

Third Preference (Third Party Verification)*
• Utility bill in your name
• Credit card statement
• Letter from Landlord, Employer, Other Entity confirming your Identity
• Rental or Vehicle Insurance Card
• Other non-photo forms of ID with name, date of birth, SSN, etc.

*Third Preference items will require at least two items be provided and program staff must document attempts to obtain First or Second preference ID and reasons this was not able to be provided. Third Preference items must be dated within the past three months, and cannot list an address other than the applicant’s primary address.

Documentation of Residency and Rental Obligation, if providing rental assistance, utility assistance, or subsidy

Agency must obtain, if available, a current lease or rental agreement, signed by the primary applicant and the landlord or sub-lessee that identifies the unit where the applicant resides and establishes the rental payment amount. Household must have an active permanent housing rental agreement or lease in the primary applicant’s name. If the household member who applied for assistance is not the household member with the lease in their name, the primary applicant may be changed to the household member with the lease in their name.

Obtaining a copy of a signed current lease or rental agreement is preferred. In the absence of a signed current lease or rental agreement, other documentation may be gathered to establish both a) residency and b) rental obligation.

First Preference:
• A current signed lease or rental agreement

Second Preference:

If a lease is not available, residency and rental obligation may be documented using the following methods.

Documentation of residency:
• An attestation by a landlord who can be identified as the verified owner or management agent of the unit, or
• A document that shows the applicant’s current name and current Oregon residential address. The document:
  o Must contain the physical address where the applicant resides and not a mailing address.
  o Must come from a verifiable business, non-profit, or government agency.
  o Must be written in ink if handwritten.
  o Cannot include any alterations such as erasures or information crossed out.
  o Cannot include a forwarding address sticker or label.

Documentation of rental or utility obligation:

• A written attestation by a landlord who is the verified owner or management agent of the unit,
• Bank statements that establish a pattern of paying rent or utilities
• Check stubs that establish a pattern of paying rent or utilities
• Court documents that state that the tenant owes rent or utilities
• Other documentation that reasonably establishes a pattern of paying rent or utilities

Documentation of Payments Other Than Rent or Utilities

Allowable program and client expenses that do not fall under rent or utilities payments must also be documented, including proof of payment needed, and proof of payment made. This can include letters, invoices, or payment requests that state the financial assistance needed and must be accompanied by an invoice or receipt that payment was made and the date made.

Applicants who apply for assistance and provide eligibility documentation remotely may do so via electronic or other communication; e.g., phone, email, text, electronic messaging, mail and other electronic or remote means. The documentation must be kept in the client file.

6. Household Application Process

Household Application Process

1. OREDAP will utilize a HUB Model for Prevention and Diversion applications.
a. Referring agencies with clients needing prevention assistance who meet the open priorities will complete a referral on behalf of the applicant, via Cognito application.
b. Applicants who are not receiving supports through a referring agency may call 211 to be screened for the open priorities. If the applicant meet one of the open priorities 211 will complete the referral through their system.

2. Only applicants who meet the income and housing status, as well as the target population status, may continue with the application process. Referring agencies will complete the initial eligibility screening, but provider agencies will make the final determination of eligibility. Those who do not fit the ALL IN criteria, but still need assistance may be referred to an alternative Prevention resource.

3. Lane County Human Services Division (HSD) will prioritize applicants based on prioritization criteria.

4. ALL IN Agency lead will be emailed an Excel spreadsheet with the basic contact and eligibility information of clients referred to them on a cadence that is agreed upon by Lane County and the provider.

5. ALL IN Agency program staff will have access to full applications/submission online via the Cognito Application.

6. ALL IN Agency program staff will follow up with applicant via contact information provided on the application and determine best way to ensure all required documentation is received.

7. ALL IN Agency program will process applications and distribute funds directly to landlords, utility company, or other authorized business or individual, for households determined to be fully eligible. Payments may not be made directly to applicants.

8. Participants will be assessed for how much financial need is necessary to stabilize the household. Households will also receive case management services in order to stabilize the household long-term. Agencies must ensure that they are meeting the target outcome numbers with the funding that they are provided, and may decide to put a cap on assistance.

9. Each eligible expense will be documented in HMIS per HMIS guidelines.

10. If an applicant does not qualify, they must be provided with the agency’s appeal and grievance process through e-mail, mail or hard copy.

**Prioritization**

Households will be prioritized based on those who are most at risk of becoming unsheltered or those who would become unsheltered the soonest.

**Outreach**

The cost of attempting to contact applicants and landlords is an eligible administrative cost. Attempts to contact all referred applicants and landlords must be tracked and stored in the applicant file.
Program staff must make three attempts to contact each applicant by whatever means (including email, telephone, U.S. mail) before discontinuing making contact attempts. Outreach to the applicant will be considered complete if (i) a request for participation is sent in writing, by mail, to the applicant, and the addressee does not respond to the request within 14 calendar days after mailing; or (ii) the grantee has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the applicants participation; or (iii) an applicant confirms that they no longer wish to participate in the program.

Outreach also includes attempts made by the referring provider. If the referring provider is different than the OREDAP provider, outreach will be considered complete when the referring provider also has made three attempts by phone, text, or email over a 10 calendar day period. Documentation of these attempts by the referring partner may be provided via email to the OREDAP provider.

For unresponsive applicants, if all three required contact attempts have been made by the referring partner and OREDAP provider, and it appears the tenant is not participating, program staff must move forward with denying the application.

Outreach to the landlord will be considered complete if (i) a request for participation is sent in writing, by mail, to the landlord, and the addressee does not respond to the request within 14 calendar days after mailing; or (ii) the grantee has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the landlord’s participation; or (iii) a landlord confirms in writing (email is acceptable) that the landlord does not wish to participate.

Contact attempts must be documented in the applicant file, such as through case notes.

Outreach to landlords is not required of OREDAP providers.

**Notification of Final Determination**

OREDAP providers must notify both the landlord and the applicant, when a final determination is made for an application. Program staff are required to provide written notice to applicants when denied program assistance or assistance is terminated. The notice must include the specific reason(s) for the denial/termination and identify the steps to appeal the decision.

Both the landlord and the applicant must be notified in writing when:
- An application is denied,
- An application is approved

Before the denial of an application for tenant unresponsiveness is finalized, the processor must:
- Warn the applicant that their application will likely be denied,
Disclose the reason for the pending denial, and
Ask the applicant if they would like to contest the decision.

If the applicant does not respond within a 10 business days of the warning that the application is pending denial, program staff can move forward with finalizing the denial. A denial warning is only required in instances where the reason for denial is tenant unresponsiveness.

After an application has been denied, the applicant may utilize the agency’s usual grievance and appeals process. If the applicant contests the decision, and is still determined to be ineligible, the denial will stand. Agencies must have policies and procedures around denials and grievances.

Payment of Rental Assistance

Payments must be made directly to the property owner, property management company, utility service, or other business or individual deemed appropriate. Payments may not be made directly to the applicant.

Individual Property Managers

If the property manager is an individual property manager, and not a property management company, documentation must be provided by the property owner that authorizes the individual property manager to collect rent on their behalf.

Super-Tenants of Subleases

In the case of sublets, a copy of the subletting/sublease agreement with sub-tenant is required, as well as the lease of the super-tenant with the property owner of record. Program staff must confirm that name of landlord on the lease is the legal owner of the residence before a direct payment can be made to the super-tenant. The legal owner of a residence may be determined by using the Lane County Property Search tool. Documentation must be provided by the property owner that authorizes the super-tenant to collect rent from a sub-tenant. If the super-tenant is still living in the unit, they are not eligible to receive payment from the program, unless they meet the usual requirements for a direct payment to tenant. Instead, they would be considered a member of the household, and must be included on the rental assistance application and payment would be made to the landlord.

Recertification
A household may only receive OREDAP assistance once between January 11, 2024 through June 30, 2025, regardless of the length or amount of total assistance. Once a household has been closed and exited from the program, they are not able to be referred or re-enroll in the program with any provider. If a household is deemed to need additional assistance, they may be referred to a non-ALL IN provider for homelessness prevention supports.

7. Additional Guidelines

OREDAP Assistance is Not Considered Income

Assistance provided to applicants through OREDAP is not regarded as taxable income and should not be considered when determining eligibility for federal benefits or federally-assisted programs.

Low-Income Housing, Federal Subsidies, Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), or Transitional Housing (TH) Programs

An eligible household that occupies a federally-subsidized residential (low-income housing) or mixed-use property may receive OREDAP assistance, provided that OREDAP funds are not applied to costs that have been or will be reimbursed under any other program.

If an eligible household receives a monthly federal subsidy (e.g., a Housing Choice Voucher aka. Section 8, Public Housing, or Project-Based Rental Assistance) and the tenant rent is adjusted according to changes in income, the renter household may receive rental assistance for the portion of the rent the applicant owes, or may receive non-rent assistance payments eligible under OREDAP guidelines, if they stabilize the household and prevent unsheltered homelessness.

If the household participates in Rapid Rehousing (RRH), or Transitional Housing (TH) programs, in many cases the renter household may not be eligible to receive rental assistance for their portion of the rent, depending on the policies of the specific PSH, RRH, or TH program. Please check with Lane County staff for assistance in determining eligibility in these situations.

Staff Training

Agency staff that provide direct services and supervise staff who provide direct services and manage homeless grants must receive relevant training. Required training must occur for staff minimally, within one year from the beginning date of employment and current staff must receive training minimally once every two years from the date of the previous training taken.
Agency must track who attended each training, the date of the training and the synopsis of the training. Records for training must be made available to OHCS, upon request. Training is an eligible expense of program development and must minimally include:

- Trauma Informed Services;
- Mental Health First Aid;
- Harm Reduction;
- Supporting Victims of Domestic Violence;
- Fair Housing; and

Other trainings may be required by OHCS more often than every two years.

Privacy Notification

Agency must have a written document that meets the requirements of this section if provided to applicant/participant in written form, or they must have a stand-alone policy that describes how the agency is providing this Privacy Notification verbally to applicants/participants.

A Privacy Notification must be provided to applicants/participants either verbally or in writing that identifies the following:

“Personally identifiable information is protected by federal laws (Privacy Act of 1974, as amended) and will be collected for the purpose of determining program eligibility, providing assistance/service, data collection, reporting and monitoring. Personally identifiable information will be shared with Oregon Housing and Community Services and other state agencies with an information sharing agreement with OHCS and are administering programs that serve the same or similar clients or populations, as is necessary to carry out the intent of an assistance or service program for the benefit of the person applying for such assistance or service and will be disclosed to Oregon Housing and Community Services without written authorization.”

Applicants/Participants may also be asked to sign a Release of Information by the agency that includes the Privacy Notification. If required to sign a Release of Information, in addition to the information above, such form must include a statement that:

“Refusal to sign such authorization cannot be the basis for denying program services to otherwise eligible applicants/participants. Applicant/Participant refusal to sign a Release of Information does not negate the inclusion of personally identifiable in secure reporting to Oregon Housing and Community Services. Oregon Housing and Community Services will de-identify applicant/participant demographic data for the purposes of reporting”.

Agency must document in the applicant/participant file that a privacy notification was provided to the applicant/participant either verbally or in writing. For all other purposes of collecting personally identifiable information, Agency must follow state and federal laws for the collection, use and sharing of applicant/participant information.
Agencies must have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

**Confidentiality**

Confidential records include all applications, records, files, and communications relating to applicants and participants of OHCS funded services regardless of hard-copy or electronic format.

Agencies must have a stand-alone policy for the confidentiality of applicant/participant records. Such policy must include:

1. Identification of how all applicant/participant records are secured and confidentially maintained.
2. A statement that all applicant/participant records must be maintained within state guidelines for the proper retention and destruction of records.
3. A requirement that all Grantee officers, employees and agents are aware of and comply with the Grantees' confidentiality policy and must include an acknowledgement of such policy, in writing.
4. A provision for the electronic collection of applicant/participant information which states that: a. Computer terminals must be in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for applicant/participant records. b. Computer monitors must be cleared (or a screen saver activated) immediately after accessing an applicant/participant record. c. Computer terminals must be on a “locked” mode or turned off if the terminal is unattended. d. Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for OHCS-funded programs. e. A statement that all records shall be open for review to federal and state authorized representatives, and auditors and/or examiners during their regular audits and monitoring functions of OHCS funded programs.

Agencies must have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

**Service Termination or Denial of Assistance**
Agencies must have written termination, denial, and grievance policies and procedures. The policies and procedures should be readily available to program participants either at intake or by posting the policy in a public place. A public place should include grantee website if services are provided in a remote capacity. It is important to effectively communicate these policies and procedures to applicants/clients and ensure they are fully understood.

Agencies are required to provide *verbal documented or written notice* to applicants/clients when denied program assistance or assistance is terminated. The notice must include the specific reason(s) for the denial/termination and identify the steps to appeal the Grantee’s and grantee’s decision.

### Grievances and Appeals

Agencies are required to have an established, written stand-alone policy for addressing applicant/participant grievances/appeal requests. Agencies must have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. Applicants/Participants must have the right and opportunity to grieve/appeal any decision that terminates, denies, limits, reduces, or modifies benefits for any reason.

Applicants/Participants must be notified of their right for a grievance or appeal of such decision and Grantee policy must clarify how and when applicants/participants are notified of their right to grieve/appeal decisions. Such grievance/appeal policy can be posted in a public place, to include the grantee website; however, applicants/participants must receive a verbal documented or written notification for any decision that terminates, denies, limits, reduces or modifies any benefit. Written notification via email is acceptable.

Any person or persons designated by Grantee and grantee(s) can complete the administrative review/appeal, other than the person who made or approved the decision under review/appeal or a subordinate of this person.

Applicants/Participants must still receive a denial notification even if the reason for denial is an agency’s lack of funding. At a minimum, the policy must include the following components:

1. Informs the participant/applicant that they can contest any Grantee’s or grantee’s decision that terminates, denies, limits, reduces or modifies any benefits and identifies the steps to follow to contest the decision;

2. Informs the participant/applicant of the reason for termination, denial, limitation, reduction or modification of benefit;

3. Allows any aggrieved person a minimum of thirty (30) days to request an administrative review/appeal of such decision;

4. Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
5. Identifies what reasonable accommodations are available for applicant/participants who have language, mobility or disability barriers that would prevent them from participating in the review/appeal process and how to request such accommodations; and

6. Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten (10) days of the final determination.

   • A statement indicating whether and under what circumstances an order by default may be entered

OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements for such a policy.

**Duplication of Benefits**

Per the Grantee’s grant agreement/contract Standard Terms and Condition, OHCS funds shall not be issued if it duplicates a benefit already paid through other sources. If a duplicate payment is made, Grantee has thirty (30) days in which to return the duplicative payment. Agencies must check to ensure that benefits issued do not duplicate other benefits for the same payment/service using HMIS and any other data system for which agencies have access. Grantees must have a stand-alone policy that identifies:

   • How they will ensure benefits are not duplicated; and

   • What system(s) they use to check for duplicated benefits.

Agencies must have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

**Conflicts of Interest**

In the performance of work, program grantees and grantee(s) will create no potential or actual conflict of interest, as defined by ORS Chapter 244, for a director, officer, agent, or employee of Grantee or grantee(s). A conflict of interest exists if, among other things, a decision or recommendation could affect the finances of the Grantee’s or grantee’s officers, agents or employees or the finances of their officer’s, agent’s, or employees’ relative. If a conflict of interest exists, the Grantee’s or grantee’s officer, agent or employee must always give written notice of the conflict, and in some situations the officer, agent or employee is restricted in their ability to participate in the matter that presents the conflict of interest. No Grantee or grantee(s) officer, agency or employee may carry out the initial evaluation required to obtain services for any person in which an actual or perceived conflict of interest does or would exist, unless in rare circumstances it is in the interest of the participant for the expediency of housing placement services or to create a seamless service delivery while keeping the participant engaged in services and such situation is documented in the participant file.
Grantee must have a conflict-of-interest policy that outlines the process for disclosing, in writing, any potential or actual conflict of interest. This includes procedures for staff when employees, board members, friends or family members apply for program services. Grantees and grantee(s) must comply with conflict-of-interest standards for both individuals and organizations. Grantee and grantee(s) must keep records to show compliance with program conflict of interest requirements.

**Organizational**
The provision of any type or amount of assistance must not be conditioned on an individual’s or household’s acceptance or occupancy of emergency shelter or housing owned by Grantee, grantee(s) or an affiliated organization. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by OHCS. If a Grantee or grantee(s) wishes to apply for a waiver, they must contact the OHCS homeless program analyst or manager for guidance in submission of a waiver request, which must be approved by OHCS. A Grantee and grantee(s) can conduct a participant’s intake assessment to determine program eligibility if the participant resides in housing where the Grantee or grantee(s) has ownership interest for the expediency of housing placement services and to create seamless service delivery while keeping the participant engaged in services. A waiver of the conflict-of-interest policy for this purpose is not required.

Grantees and grantee(s) cannot steer potential renters to units owned or operated by the Grantee or grantee(s), if the renters will be using a rent subsidy paid with any OHCS funds. Rent-subsidized tenants are free to execute a rental contract with another landlord within the Grantee’s or grantee’s jurisdiction or they can choose to rent a unit owned or operated by the Grantee or grantee(s). A waiver request is not required for this situation; however, Grantees and grantee(s) must comply with this provision of the conflict-of-interest policy.

**Individual**
For the procurement of goods and services, Grantee and grantee(s) must comply with the codes of conduct and conflict of interest requirements. Persons for whom the conflict-of-interest requirements apply include any person who is an employee, agent, consultant, officer or elected or appointed official of the Grantee or grantee(s) agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the programs, or who is in a position to participate in decision-making processes or gain inside information with regard to activities assisted under the programs, can obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has a family or business tie, during his or her tenure or during the one-year period following his or her tenure.

Grantee must have a Conflict-of-Interest stand-alone policy that complies with the following:

1. States that Grantees officers, agents or employees will create no perceived, potential or actual conflict of interest;

2. Identifies how officers, agents and employees are notified of policy;
3. Outlines the process for disclosing, in writing, any potential or actual conflict of interest;

4. Identifies the process the Grantee will follow when notice of a perceived, potential, or actual conflict of interest is received and must include procedures for staff when employees, board members, friends or family members apply for program services; and

5. Identifies how records are kept of perceived, potential, or actual conflicts of interest. Grantees must ensure that grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

Fraud Prevention

Agencies are required to have a Fraud Policy. Agencies may reference Lane County's Fraud Policy which can be found at https://lanecounty.org/UserFiles/Servers/Server_3585797/File/HSD/Rent%20Assistance%20Program%20Fraud%20Policy%20approved.pdf

Agencies will determine the owner of the property before making a payment. The legal owner of a residence may be determined by using the Lane County Property Search tool. The owner of an LLC may be determined by using the Oregon Secretary of State Business Name Search tool.

Lane County Property Search Tool: https://lanecounty.org/government/county_departments/information_services/maps__gis/lane_county_gis_map_gallery/property_search

Oregon Secretary of State Business Name Search: https://sos.oregon.gov/business/pages/find.aspx

Homeowner expenses are not eligible expenses: if the owner of the property is the same as the applicant, the application will be denied.

If the tenant requests payments be made to an individual property manager who is not the owner of the property, the property owner must provide documentation that the individual property manager is authorized to collect rent on the property owner’s behalf.

Applications with Increased Risk of Fraud

If program staff has a legitimate reason to believe an individual is providing false information or is attempting to commit fraud, staff will follow their agency’s Fraud Policy. If the application is denied, the applicant will have an opportunity to appeal or file a grievance to have the denial reviewed in accordance with the agency’s grievance policy. Instances of fraud reported to Lane County will be handled in accordance with Lane
County’s Fraud Policy which can be found at
https://lanecounty.org/UserFiles/Servers/Server_3585797/File/HSD/Rent%20Assistance
%20Program%20Fraud%20Policy%20approved.pdf

Additional Documentation Requirements for Situations with Increased Risk of Fraud

Additional documentation establishing tenancy will be required in situations with increased risk of fraud, including situations involving dual relationship between landlord and tenant, and when the landlord mailing address is the same as the tenants’. Additional Documents to establish tenancy include:

- Government issued ID or Driver’s License reflecting current address
- Oregon vehicle title or registration card
- Utility hook up order or utility statement issued by the service provider
- Any document issued by a financial institution that includes the applicant’s residence address
- Any item delivered by the United States Postal Service, FedEx, or UPS sent by a verifiable business or government agency
- Any document issued by an insurance company or agent
- Any document issued by an educational institution
- A U.S. government-issued marriage certificate or license signed by a government official
- A loan agreement, payment booklet/voucher, or loan statement
- Paycheck, paystub, W-2 or 1099 tax form
- An Oregon Department of Consumer & Business Services (DCBS) issued manufactured structure ownership document
- Oregon voter notification card or voter profile report or Selective Service card
- Medical or health benefits card
- Unexpired professional license issued by an agency in the U.S.
- Current Certificate of Eligibility for Exchange Visitor (J-1) status (DS2019)
- Approved letter from Oregon State Hospital, homeless shelter, transitional service provider or halfway house dated within 60 days of your application certifying your residence address
- Letter from Department of Veterans Affairs Rehabilitation Center & Clinics certifying your address
- Letter on company letterhead from an employer certifying that you live at a non-business address owned by the business or corporation
- Other documents issued by a third party will be considered on a case-by-case basis.

The document:

- Must contain the physical address where the applicant resides and not a mailing address.
- Must come from a verifiable business, non-profit, or government agency.
• Must be written in ink if handwritten.
• Cannot include any alterations such as erasures or information crossed out.
• Cannot include a forwarding address sticker or label.

Non-Discrimination

Grantees are required to comply with all state and federal statutes relating to nondiscrimination. Agencies must have a stand-alone policy that complies with the following:

1. A statement that agencies will comply with all state, federal or local statutes, rules and guidelines for all protected classes and will not take any of the following actions based on race, color, national origin, age, religion, gender, familial status, or disability (federal) or victims of domestic violence, marital status, sexual orientation, gender identity or source of income (state):
   • Refuse to accept an application for housing assistance or services;
   • Deny an application for housing assistance or services;
   • Set different terms, conditions or privileges for housing assistance or services;
   • Provide different or specific housing, facilities or services;
   • Falsely deny that housing is available for inspection or rental or that services are available; or
   • Deny anyone access to a facility or service; and

2. Identifies how applicants or participants can request reasonable accommodation to access assistance or services, how that process is communicated to applicants and participants and how those requests are processed. Grantee(s) have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of any policy that in its determination does not meet basic principles or requirements of such a policy.

The Fair Housing Act prohibits discrimination based on protected classes in the housing activities of advertising, screening, and unit rentals. Using a target population in screening is allowed; however, refusal to accept applications or provide information on services or available housing to any protected class, even if these groups do not fit into the targeting strategy, is prohibited.

Screening criteria cannot be discriminatory and must be consistently applied. A priority population means persons that are determined to have the greatest need and will receive services first; however, priority cannot be used as means of denying any person assistance and refusal to refusal to accept applications or provide information on services, or available
housing, to any protected class, even if these groups do not fit into the priority population, is prohibited. For example, a provider might decide to give priority to applicants/participants who graduate from a tenant readiness education program that is inclusive of all protected classes. If two requests come in at the same time and both meet the screening criteria, the applicant/participant who also has the tenant readiness education experience could receive priority over the applicant who does not; however, providers must always accept the first request meeting their criteria or prioritization policy.

OHCS reserves the right to require a prioritization of participants when such prioritization is intended from a specific funding source. Grantees and their grantee(s) must adhere to such prioritization required by OHCS.

**Addressing Barriers to Program Accessibility**

Program providers should address barriers that potentially eligible households may experience in accessing the program. This includes providing language interpretation services, program documents in multiple languages, and by conducting targeted outreach to populations with disproportionately high levels of unemployment or housing instability or that are low income. EO OREDAP providers should also provide, either directly or through partner organizations, culturally and linguistically relevant outreach and services to ensure access to assistance for all eligible households. Program staff must provide access to language interpretation services and assistive devices necessary for applicants to understand the documents they are certifying.

**Limited English Proficiency**

The Federal government has issued a series of policy documents, guides and regulations describing how agencies address the needs of persons who have limited English proficiency (LEP). The abbreviated definition of persons with limited English proficiency are those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Agency must have a LEP stand-alone policy that describes the following:

1. The actions Grantee took to identify LEP populations in their service area and cites any source(s) used for evaluation;

2. Defines actions Grantee will take to provide language assistance and address language barriers;

3. States how and how often staff will receive training about assisting LEP persons; and

4. Identifies that, minimally, LEP populations are evaluated biennially and that updates to the LEP Policy incorporates any needed changes to address new or emerging LEP populations.

Agency must have policies that align with OHCS requirements and are consistent with the intent of such a policy as outlined by OHCS. OHCS retains the right to require modification of
any policy that in its determination does not meet basic principles or requirements of such a policy.

Agency can create a written Language Access Plan (LAP) to provide a framework to document how the agency’s programs will be accessible to all populations in their service area. Grantees and grantee(s) who serve few persons needing LEP assistance can choose not to establish a LAP; however, the absence of a written LAP does not release Grantee’s and grantee’s obligation to ensure LEP persons have access to programs or activities.

8. Data Entry: Homeless Management Information System (HMIS)

All eligible applications that are approved for funding must be entered into HMIS within 48 hours of completed application approval. The HMIS privacy script must be read to the applicant prior to entering in information unless a staff member at the agency has read it to them in the past OR they checked the box approving HMIS data entry in the initial online application. All payments must be tracked in HMIS (this is the official spenddown report). OREDAP funds are exempt from the 6 and 12-month follow up Key Performance Measure.

Data quality reports should be run at least monthly and any errors identified must be corrected promptly. Lane County staff will provide training and are available to help with report review and corrections when needed.

HMIS Universal and OHCS-required Data Elements that must be collected for this program include, but are not limited to:

1. Name
2. *Social Security Number
3. Date of Birth
4. Race/Race Additional
5. Ethnicity
6. Gender
7. Veteran Status
8. Disabling Condition
9. Current Living Situation
10. Prior Living Situation
11. Project Start Date
12. Project Exit Date
13. Destination
14. Relationship to Head of Household
15. Client Location
16. Current County of Residence
17. Percent of AMI
18. Total amount of each type of assistance provided to each household
19. Number of months of rental payments and number of months of utility or home energy cost payments for which EO OREDAP assistance is provided
20. For landlords and utility providers, the name, address, and Social Security number, tax identification number or DUNS number

For full guidance on the Lane County HMIS Rent Assistance Data Entry, use the following link: Rent Assistance Service Transactions : Lane County HMIS Help Desk (freshdesk.com)

* A Social Security number is not required to receive services.

9. Administrative Costs

Subgrantees are allowed to use up to ten percent (10%) of their total OREDAP allocation for administrative costs, including those allowed for subrecipient organizations with whom the subgrantee contracts. There is an expectation that administrative funds will be shared with subrecipients commensurate to the services provided through the program by subrecipients.

Please note, that indirect costs are allowed to be applied to the Administration category. Allowable administrative costs typically, but not exclusively, benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed must be supported by actual costs.

Allowable costs include, but are not limited to:

- Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;
- General services such as accounting, budget development, personnel, contracting, marketing, agency audit, agency insurance;
- Board expenses (excluding meals);
- Organization-wide membership fees and dues specific to homeless systems and programs;
- General agency facilities costs (including those associated with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization’s direct or indirect cost allocation plan);
- Equipment rental/purchase, insurance, utilities, and IT costs that are not program specific but relate to the administration of the agency as a whole;
- Directly allocable costs such as marketing and communications for the program;
- Indirect costs, including Negotiated Indirect Cost Rate Agreements (NICRA); and
- Allocated costs, consistent with an agency Cost Allocation Plan.

10. Agency Responsibilities

Data Privacy and Security

Agency agrees to establish data privacy and security requirements as required by Lane County and Oregon Housing and Community Services.
Record Keeping

Agencies shall retain all program records pertinent to client services and expenditures incurred under ORE-DAP program in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules.

Find the OHCS Special Schedule at the Oregon State Archives: [https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx](https://sos.oregon.gov/archives/Pages/state_admin_schedules.aspx).

Find the State Agency General Records Retention Schedules at the Oregon State Archives: [https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx](https://sos.oregon.gov/archives/Pages/records_retention_schedule.aspx).

Agencies shall retain and keep accessible all such fiscal and program records, client records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of six years, or such longer period as may be required by applicable law, whichever date is later. Applicable law includes the following final payment and termination of ORE-DAP program funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to ORE-DAP program funded programs.

Subrecipient Monitoring

Lane County must monitor subrecipient agencies at least once during a biennium or the term of the Master Grant Agreement, as determined by OHCS.

OHCS may conduct a program monitoring of Lane County subgrantees at least once a biennium.

Lane County subgrantees will be notified thirty (30) days in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. OHCS via Lane County will provide Lane County subgrantees with a written monitoring report inclusive of any findings, concerns or comments. Lane County Subgrantees are required to submit timely corrective action to findings and failure to do so may result in the withholding and/or return of funds to Lane County.

Agency Policies and Procedures

Agencies processing EO OREDAP funds must have the following policies and procedures, separate and in addition to Lane County policies and procedures, and be able to provide them upon request:

- Written termination, denial, grievance, and appeals policies and procedures;
- Written Fraud policy;
- Written Duplication of Benefits policy;
- Written Limited English Proficiency policy;
- Written Confidentiality policy;
• Written Non-Discrimination policy;
• Written Conflict of Interest policy;
• Written Privacy Notification Policy
• Program Policies and Procedures Document which includes:
  o Written policies aligned with Low-Barrier services;
  o Written policies aligned with Trauma-Informed services;
  o Written policies aligned with Housing Focused services;
  o Written policies identifying how services will be provided to program participants;
  o Written policies related to how feedback is gathered and utilized.

These policies must be on agency letterhead and may not be substituted with Lane County policies and procedures.